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August 22, 2019

Via ECF

The Honorable Karen M. Williams U.S. District Court, District of New Jersey Mitchell H. Cohen Building & U.S. Courthouse 4th& Cooper Streets Camden, NJ 08101

Re: The HomeSource Corp. v. Retailer Web Services, LLC D.N.J., Docket No. 1:18-cv-11970-JBS-KMW Our File No. R0939-1001

Dear Judge Williams:

We represent Defendant, Retailer Web Services, LLC ("RWS"), in connection with the above-referenced matter. Plaintiff HomeSource Corp. filed a Motion for Sanctions against RWS under Federal Rule 37 on August 19, 2019. (ECF Doc. 106). Under Local Rule 37.1, Plaintiff was required to request leave of court prior to filing any discovery motions, which Plaintiff did not do prior to filing this Motion.

In order to clarify whether Plaintiff complied with the local rules, whether RWS should respond to this Motion, and other outstanding issues, RWS requests that this Court schedule a phone status conference.

Respectfully,

/s/ Matthew A. Lipman

MATTHEW A. LIPMAN

MAL/mar

cc: Alexis Arena, Esquire (via ECF)

Eric R. Clendening, Esquire (via ECF) Adam Wolek, Esquire (via email w/ encl.) William C. Wagner, Esq. (via email e/ encl.)